

3036112 - SLM

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREAT AMERICAN INSURANCE COMPANY,

Plaintiff,

v.

Case No: 17-cv-3083

STATE PARKWAY CONDOMINIUM ASSOCIATION;
LIEBERMAN MANAGEMENT SERVICES, INC.;
DONNA WEBER; MICHAEL J. NOVAK,
INDIVIDUALLY AND IN HIS REPRESENTATIVE
CAPACITY FOR HIS MINOR CHILD T.N. AS
PARENT AND NEXT FRIEND; and
CHRISTINA BUGELAS NOVAK,

Defendants.

STATE PARKWAY CONDOMINIUM ASSOCIATION,

Counter-Plaintiff,
Third-Party Plaintiff

v.

TRAVELERS CASUALTY AND SURETY COMPANY
OF AMERICA; AMERICAN INTERNATIONAL
SPECIALTY LINES INSURANCE COMPANY;
HARLEYSVILLE LAKE STATES INSURANCE
COMPANY; STEADFAST INSURANCE COMPANY;
and STRATHMORE INSURANCE COMPANY,

Third-Party Defendants.

**AGREED MOTION FOR EXTENSION OF TIME FOR THIRD-PARTY DEFENDANT,
HARLEYSVILLE LAKE STATES INSURANCE COMPANY, TO ANSWER OR
OTHERWISE PLEAD AGAINST STATE PARKWAY CONDOMINIUM
ASSOCIATION'S THIRD-PARTY COMPLAINT**

NOW COMES the, Third-Party Defendant, Harleysville Lake States Insurance Company (“Harleysville”), by and through its attorneys, SmithAmundsen, LLC, and for agreed motion for an extension of time to answer or otherwise plead against State Parkway Condominium Association’s (“State Parkway”) Third Party Complaint, states as follows:

1. State Parkway filed a Third-Party Complaint on October 31, 2017. (Doc. 43)
2. Harleysville filed its appearance on January 19, 2018.
3. This Court ordered an updated Status Report to be filed on or before January 24, 2018.
4. Harleysville is securing certified copy of the Policy at issue for its responsive pleading and its counsel is waiting for a copy of the file materials to review in preparation of responding.
5. No enlargement of time has been previously requested in this case and no dates have been set for pre-trial conference or trial and the extension of time will not delay any pending Court ordered hearing or Status Report.
6. The relief requested is for good cause and will not result in undue delay in the administration of this case.
7. State Parkway’s counsel has no objection to the said motion and has agreed to an enlargement of time for Harleysville to answer or otherwise plead against the Third Party Complaint.

WHEREFORE, Third-Party Defendant, Harleysville Lake States Insurance Company, respectfully requests that this Court extend the time for Harleysville to file its answer or responsive pleading against State Parkway Condominium Association’s Third-Party Complaint to February 28, 2018.

Respectfully Submitted,

By: /s/ Sulema Medrano
Sulema Medrano (ARDC # 6299490)
SmithAmundsen, LLC
150 N. Michigan, Suite 3300
Chicago, Illinois 60601
Telephone: 312-8964-3244
Email: Smedrano@salawus.com

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record in this case by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Sulema Medrano
Sulema Medrano (ARDC # 6299490)
SmithAmundsen, LLC
150 N. Michigan, Suite 3300
Chicago, Illinois 60601
Telephone: 312-8964-3244
Email: Smedrano@salawus.com